FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL

PERMITTEE

The Kewanee Corporation Attn: Steve Screeton 1642 Burlington Avenue Kewanee, Illinois 61443

Application No.: 73110003 I.D. No.: 073065AAF

Applicant's Designation: MTL FBRCTN Date Received: January 12, 2006

Subject: Prefabricate metal for Buildings

Date Issued: DRAFT Expiration Date:

Location: 1642 Burlington Avenue, Kewanee

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Parts Washer
Door Assembly Gluing Process
Two Oven-Dried Paint Lines
Two Air-Dried Paint Lines

This Permit is subject to standard conditions attached hereto and the following special condition(s):

- This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/yr for VOM, 10 tons/yr for a single Hazardous Air Pollutant (HAP) and 25 tons/yr for combined HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 215.204(j)(2) and (5), coatings, as applied, including thinner or makeup solvent, shall not exceed 3.5 lb VOM content/gal for air dried coatings and 3.0 lb VOM/gal for oven dried coatings excluding water and any compounds which are specifically exempted from the definition of volatile organic materials in 35 Ill. Adm. Code 211.7150.

b. The VOM emissions from the coating operations, including clean-up, shall not exceed the 8.3 ton/mo and 82.6 ton/yr VOM.

VOM and HAP emissions should be calculated as a product of the quantity of material used and its VOM/HAP content.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data from the previous month plus the preceding 11 months (i.e., a 12 month running total).

- 3a. Pursuant to 35 Ill. Adm. Code 215.182 for Cold Cleaning, the parts washer system shall comply with the following conditions:
 - i. Waste solvent shall be stored in covered containers only and not disposed of in a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere.
 - ii. A permanent conspicuous label summarizing the operating procedure is affixed to the parts washer system.
 - iii. The spray gun of the parts washer system shall have a solid fluid stream spray rather than a fine, atomized or shower spray.
- b. This permit is issued based on negligible emissions of particulate matter and VOM from the parts washer. For this purpose, emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 4. This permit is issued based on negligible emissions of VOM from the glue for the door assembly. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 6. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 8. Emissions from natural gas combustion shall not exceed the following limits:

		Emissions		
Pollutant	Emission Factor lb/mmscf	Ton/Month	Ton/year	
Nitrogen Oxides (NO_x)	100	1.2	11.8	
Carbon Monoxide (CO)	84	1	9.9	
Particulate Matter (PM)	7.6	0.1	0.9	
Volatile Organic Material (VOM)	5.5	0.07	0.7	

These limits are based on standard emission factors given in Section 1.4 of the AP-42 (5th edition Supplement D , July 1998).

Compliance with annual limits shall be determined on a monthly basis from the sum of the data from the previous month plus the preceding 11 months (i.e., a 12 month running total).

- 9. The Permittee shall maintain monthly records of the following items:
 - a. VOM and HAP containing raw material usage (gallon/month or lb/month, gallons/year or lb/year);
 - b. VOM and HAP content of each material (lb/gallon or wt. %);
 - c. Natural gas usage (mmscf/mo); and
 - d. Calculated VOM, single HAP and total HAPs emissions (tons/month and tons/year).
- 10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

 $\underline{\text{and}}$ one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control 5415 North University Peoria, Illinois 61614

It should be noted that the chlorodiflouromethane emission of the foam froth used in the foam core door injection process is not a regulated pollutant for the purposes of this permit.

If you have any questions on this permit, please call Bruce Beazly at 217/782-2113.

Donald E. Sutton, P. E. Manager, Permit Section
Division of Air Pollution Control

DES:BDB:lsm

cc: IEPA, FOS Region 2
IEPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the metal coating plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less coating is used, and control measures are more effective than required in this permit.

Emissions

Emission Units	NOx	СО	PM	MOV	Single HAP	Total HAP
Parts Washer			0.44	0.44	<10	<25
Door Assembly Gluing Process				0.44		
Coating Use				82.6	<10	<25
Natural Gas Usage	11.8	9.9	0.9	0.7		
Total	11.8	9.9	1.3	84.2	<10	<25

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